



"Voice of Louisiana
Agriculture"

Louisiana Farm Bureau Federation, Inc.

P.O. BOX 95004 • 9516 AIRLINE HIGHWAY
BATON ROUGE, LA. 70895-9004 • PH. 225/922-6200

September 8, 2000

Mississippi River/Gulf of Mexico Action Plan (4503F)
C/O United States EPA
1200 Pennsylvania Ave NW
Washington, DC 20460

COMMENTS: Draft Action Plan for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico (Action Plan)

The Louisiana Farm Bureau Federation (LFBF) appreciates this opportunity to respond to the draft Action Plan. The hypoxia issue in the Northern Gulf of Mexico (Gulf) is assumed to be a result of excessive nutrient loading from the Mississippi and Atchafalaya Rivers. Scientists continue to debate the link between the nitrogen loads in these rivers and hypoxia in the Gulf. The scientific community (as well as the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force (Task Force)) agrees that significant uncertainties exist in understanding of the causes and consequences of Gulf hypoxia. Substantiated scientific knowledge to know if a reduction in nitrogen by a given amount will result in a corresponding reduction in hypoxia in the Gulf is not available. The quantitative relationships between reductions in nitrate loads entering the Gulf and improvements in oxygen levels are not understood. Defensible numerical goals for reductions in nitrate loads entering the Gulf do not exist. LFBF, therefore, does not support the numeric goals outlined in the Action Plan for the reduction of annual nitrogen loading in the Gulf.

The Action Plan's numerical reductions for nitrogen loads entering the Mississippi River are based on model simulations. Modeling is only as good as the data utilized (this is very important). The Action Plan's numeric goals are based on a modeling effort that does not incorporate comprehensive scientific data. Significantly more monitoring and research are needed in order to provide substantiated scientific data before numeric goals become the "law of the land." The impact of the Action Plan's numeric reductions for nitrogen loads on agriculture is unrealistic and unfounded. The goal of 30 percent reduction in the nitrogen load translates into a 68 percent reduction in nitrogen fertilizer use. Agricultural production in the entire Mississippi River Watershed would be negatively impacted by this plan.

The Action Plan is attempting to force this numeric loading issue through without conclusive data and limited input from production agriculture. EPA appears to be on the "fast track" to implement another bureaucratic program. Setting numeric standards for a nutrient loading reduction goal is unjustified and will be unfairly interpreted and applied by the Federal agencies overseeing the eventual program.

LFBF questions the motive for this Action Plan. Emphasis for the plan are being based on an emotional proclamation that a "dead zone" in the Gulf is an enormous threat to the biological integrity and productivity of the Gulf. However, in the real world, there has been no evidence presented depicting a detrimental ecological and economic impact on the Gulf or its fisheries as a result of the hypoxia or "dead zone" issue. "Dead zone" monitoring in the Gulf has been anything but conclusive. A recent scientific survey (summer 2000) showed the zone to be approximately 1,700 square miles as compared to 7,728 square miles in 1999, even though we are experiencing a third straight year of drought conditions in the lower Mississippi River Valley Basin area.

In 1998, the zone was estimated to be 4,800 square miles (a 22% reduction from 1997). The monitoring data, however, shows that the hypoxic zone has declined 32% since 1995. Also, the economic assessment based on fisheries data has failed to detect effects attributable to hypoxia. National Marine Fisheries Service (NMFS) data showed that in 1994 (when the "dead zone" was claimed to be 7,000 square miles in size) Louisiana fisheries harvested the largest and highest dollar value catch in nearly a decade. A more recent survey by NMFS (1998-99) revealed that commercial fishermen in Louisiana Gulf waters brought in 328 million pounds of fish. This placed Louisiana as having the fourth largest landings in the nation. Furthermore, marine fisheries scientists have expressed concerns that a "hurry up and reduce the nutrient load plan" in the Mississippi River could have a detrimental effect on Gulf fisheries. Fewer nutrients in the river may mean fewer fish in the Gulf.

The Task Force has not been able to find any decline in Gulf fisheries, including catches of crabs and shrimp, which are bottom-dwelling creatures more vulnerable to hypoxia. Nor has the Task Force presented data to support any upward trend in the nitrogen loadings of the lower Mississippi River waters in recent years. The Task Force can substantiate neither a hypoxia trend to arrest, nor a nutrient problem to solve. The plan is over-ambitious and is attempting to move forward without substantiated evidence regarding excessive nutrient loading from the Mississippi River to the Gulf.

Serious questions remain unanswered concerning the possible implementation of this Action Plan. There is no information depicting the huge costs for reducing nutrients in the Mississippi River and the economic impact the plan will have on the most productive and environmentally beneficial farming in the world. We have only scratched the surface of the complexity of the Mississippi River system.

Before any plan (especially the proposed plan) is approved, more work is warranted to understand the tremendous complexities of this issue. U. S. agriculture is producing more crops today with less fertilizer, meaning we are more efficient and leaving less nitrogen in the environment.

The premise of the Action Plan should be based on voluntary, cooperative, incentive-based programs to improve water quality in the Mississippi River Basin and the Gulf without damaging the most productive farming in the world. The focus of this plan should be on additional resources, better targeted to impaired watersheds, and directed at on-the-ground activities and practices that will result in further water quality improvements. Additional research and pilot projects are needed to determine how farmers can most effectively reduce nutrient loss to our waters. Additional funding is needed for state-directed technical assistance and financial incentives for farmers and assistance in the development of nutrient management plans. Research funding that focuses on nitrogen utilization, efficiency, and loss reduction technology in impaired watersheds is essential for long-term solutions to nutrient loss. Fully funded and supported programs that work with farmers to improve water quality through cost-sharing and nutrient management that supports the economics of a particular farming entity is the most effective method of reducing nutrients to waters in the Mississippi River Basin and the Gulf.

There are many unanswered questions regarding the hypoxia area in the Gulf. Our concern with the Action Plan is that decisions for protecting the waters of the Gulf are being made on poor quality of data. The cause of the lack of a consistent relationship between nitrogen fertilizer use and nitrogen concentration in the Mississippi River needs to be researched thoroughly. All relevant scientific data available must be considered before a plan is set into motion.

Sincerely,

A handwritten signature in black ink that reads "Ronnie Anderson". The signature is written in a cursive, flowing style.

Ronald R. Anderson
President

RA:RH/klm